

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL ITS OPPOSITION TO  
UBER'S MOTION TO COMPEL 30(B)(6)  
TOPICS**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo's Administrative Motion to File Under  
7 Seal information in its August 21, 2017 Opposition to Uber's Motion to Compel 30(b)(6) Topics (the  
8 "Administrative Motion"). The Administrative Motion seeks an order sealing the following materials:

9 Document	Portions to Be Filed Under Seal	Designating Party
10 Portions of Waymo's August 21, 2017 Opposition to Uber's Motion to Compel 30(b)(6) Topics (Waymo's Motion")	Highlighted in green	Waymo
12 Exhibit 3 to Waymo's Motion	Highlighted in red	Waymo

13  
14 3. Portions of Waymo's Opposition and Exhibit 3 (identified in the table above) contain,  
15 discuss, or refer to Waymo's confidential business information, including internal valuations, identity  
16 of financial services providers, and internal discussions regarding mergers and acquisitions. Public  
17 disclosure of this information to Waymo's competitors would harm Waymo by giving its competitors  
18 access to Waymo's highly confidential internal business activities. Page 1 of Waymo's Opposition  
19 additionally contains, discusses, or refers to confidential details regarding the corporate ownership,  
20 corporate leadership, business models, prototype development and testing, and employee recruitment  
21 efforts, which Waymo understands are highly confidential to Kitty Hawk, and disclosure of such  
22 information would inflict serious and irreparable damage to Kitty Hawk's business. (See Dkt No.  
23 1115 ¶ 3). Waymo's request to seal is narrowly tailored to only the confidential information.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
2 true and correct, and that this declaration was executed in San Francisco, California, on August 21,  
3 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7  
8 **SIGNATURE ATTESTATION**

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
10 filing of this document has been obtained from Felipe Corredor.

11 /s/ Charles K. Verhoeven

12 Charles K. Verhoeven